

STATE OF DELAWARE ENHANCED 9-1-1 EMERGENCY SERVICES BOARD SAFETY & HOMELAND SECURITY BUILDING 303 TRANSPORTATION CIRCLE DOVER, DELAWARE 19901

THE HONORABLE RUTH ANN MINNER GOVERNOR OF DELAWARE

The Honorable David B. Mitchell, J.D.
The Honorable Thomas M. Jarrett
Finley Jones
Craig S. Harrington
Michael F. Metcalf
Debra Puglisi-Sharp
James E. Turner

Phone:(302) 744-2680 Fax: (302) 739-6774

September 1, 2005

SUBJ: WT Docket 05-196 VoIP and E9-1-1 Service

I am writing on behalf of the State of Delaware's E911 Emergency Services Board in regards to WT Docket 05-196. The E911 Emergency Services Board is charged by Delaware Code to oversee all matters related to the E911 system, service, and funding thereof.

The E911 Emergency Services Board officially supports the FCC's ruling to require interconnected VoIP providers to ensure they deliver accurate location and call-back information to all our nine (9) PSAP's when their subscribers dial 9-1-1 for emergency services.

If the FCC's ruling is changed or extended, it will have serious implications on the operations of the State of Delaware's 9-1-1 Centers. VoIP calls currently are routed into our 9-1-1 trunks, but are delivered as Phase 0 calls with no callback number or location of the caller. It is imperative that this service should be treated no differently than receiving normal landline calls where callback numbers and location information are readily available to our 9-1-1 dispatchers. Just think of an open line to one of our 9-1-1 dispatchers hearing screaming for help in the background trying to figure out who is calling, where they are calling from, and what is taking place.

The State of Delaware's E911 Emergency Services Board is urging the FCC not to fold under the pressure of the VoIP providers that request time extensions. Please **do not** extend the 120-day deadline for interconnected VoIP providers to provide enhanced 9-1-1 services to their subscribers. These people are entitled to a clear path to 9-1-1 services where seconds count in the saving of lives and property. And our 9-1-1 professionals are entitled to the same technology (ANI/ALI) that is currently available to them in finding these callers.

We are urging the FCC to ensure us that any requirements imposed on VoIP providers will not cause undue burden on our PSAP's ability to process and dispatch emergency responses to the people we serve. Please take into consideration the operational requirements of the current PSAP infrastructure and should not impose rules that will require us considerable upgrades or replacement of our current PSAP equipment.

Yours in the Emergency Services

David B. Mitchell, J.D., Chairman E9-1-1 Emergency Services Board State of Delaware